

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
Naco Division

FILED  
APR 10 2015  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY MC DEPUTY  
NUMBER:

**PLAINTIFF, Bradrick J. Collins individually**

**CIVIL ACTION NUMBER:**

W15CA112

**V.**

**Baylor University**  
**Robin K. Rogers**  
**Helen Harris**

## **PLAINTIFF'S ORIGINAL COMPLAINT**

TO THE HONORABLE COURT:

**Plaintiff Bradrick J. Collins individually, files this Original Petition against Defendants Baylor University, Robin K. Rogers, and Helen Harris and in support thereof would respectfully show the court as follows:**

**I.**

**PARTIES**

1.

Plaintiff Bradrick J. Collins, individually is a Texas resident, residing at 7200 S. R.L. Thornton Freeway #7A Dallas, Texas 75235.

2.

Defendant, Baylor University, is a Texas non-profit corporation, and has its principle place of business at One Bear Place #97096, Pat Neff Hall Waco, Texas 76798-7096 and may be served with process by serving its registered agent for service: C.T. Corporation Systems 1999 Bryan Street, Suite 900 Dallas, Texas 75201.

3.

Defendant Robin K. Rogers resides at 539 N. 30<sup>th</sup> Street Waco, Texas 76707.

4.

Defendant Helen Elisabeth Wilson Harris resides at 827 Cattle Drive Crawford, Texas 76638.

## II.

### JURISDICTION AND VENUE

5.

This Court has jurisdiction pursuant to 28 U.S.C. 1331; 28 U.S.C. 1343; 28 U.S.C. 1983, Article 3 of The United States Constitution Section 2; The Civil Rights Act 1964 Title 7, 42 U.S.C. 1981, 14<sup>th</sup> Amendment to the United States Constitution and 28 U.S.C. 1343.

6.

Venue is proper in this District by operation of 28 U.S.C. § 1391. The United States District Court of the Western District of Texas is a judicial district where defendants resides, and all defendants resides within the State of Texas, and the Western District of Texas is where a substantial part of the events or omissions giving rise to the claim occurred.

## III.

### **STATEMENT OF FACTS**

7.

Plaintiff was granted admission into the Baylor University School of Social Work and said admission was accepted when Baylor University School of Social Work sent Plaintiff an offer of admission dated December 19, 2012, in which Plaintiff did sign and return to Defendant with a signed letter of intent to enroll (Exhibit #1 and #2).

8.

The Associate Dean for Graduate Studies make decisions about acceptance of transfer of course credits. In an effort to avoid Plaintiff having to take 44 credit hours, Associate Dean Robin K. Rogers offered Plaintiff the option of taking 6 credit hours during the summer 2013 semester and 26 specified courses plus 3 hours electives during the fall 2013 – Spring 2014 semesters for a total of 35 credit hours. Such offer of transfer acceptance did not include a “candidacy period”, nor was such period a necessary condition for granting Plaintiff transfer credits (Exhibit #1).

9.

Plaintiff avers that Associate Dean Robin K. Rogers changing Plaintiff application to the Advanced Standing Option resulted in breach of contract, in which plaintiff is entitled to damages and other remedies at law.

10.

Plaintiff alleges that the Graduate School letter of admission constitutes the University’s only official notification of the admissions decisions and admission decisions are final and applicants are either accepted unconditionally, probationary, or denied. Plaintiff was accepted unconditionally, therefore, Associate Dean Robin K. Rogers acted outside his

authority by changing the admission committee decision resulting in breach of contract between Plaintiff and Defendant Baylor University (Exhibit #1).

11.

Plaintiff avers that when defendant Robin K. Rogers changed plaintiff admission option into Advanced Standing Program, defendant effectively took plaintiff out of admission status into that of a “candidacy for admissions” even after the decision to admit plaintiff unconditionally had been determined by the admission committee, resulting in breach of contract.

12.

By virtue of defendant Robin K. Rogers changing Plaintiff admission from unconditional enrollment to candidacy period after an admission decision was offered and accepted resulted in a breach of the original agreement (Exhibit #3).

13.

Plaintiff was denied admission into the Baylor University School of Social Work during the fall semester of 2013 as promised in the offer of admission, and plaintiff acceptance of said offer (Exhibit #3).

14.

Defendant was negligent in failing to notify Plaintiff of the adverse consequences of changing Plaintiff enrollment status from unconditional acceptance to that of a candidacy period. As a result of such negligence, Plaintiff has spent a considerable amount of money moving to Waco, Texas from Baton Rouge, Louisiana. Plaintiff wife resigned from her job in Louisiana to support Plaintiff educational goals, Plaintiff has paid

thousands for course work and course work related materials Plaintiff was not required to take or obtain as a condition of enrollment.

15.

The School of Social Work Catalog does not allow the Associate Dean to grant Advanced Standing with the requirement of preparatory classes to a prospective transfer student who has completed an entire first year of a Master's of Social Work program from an accredited University social work program. Associate Dean Robin K. Rogers informed Plaintiff that Plaintiff status would be changed to admit Plaintiff into the Advanced Standing program, but did not properly inform Plaintiff that Plaintiff would be subjected to 6 preparatory hours as a condition to admission (Exhibit #3).

16.

Defendant Robin Rogers committed fraud by non-disclosure when he failed to disclose to the Plaintiff that Plaintiff would be subjected to a "candidacy period" prior to actual enrollment into the Master of Social Work program and Plaintiff relied on such non disclosure when considering Baylor University as an institution in which Plaintiff could complete his Masters Degree in Social Work.

17.

Plaintiff alleges Defendants violated Plaintiff's Civil Rights by denying him enrollment into the School of Social Work after enrollment was granted. Thus enrollment was extended to other equally or less qualified applicants and not to Plaintiff (Exhibit #3).

18.

Although a private university, Baylor University is a not for profit organization receiving funding from the United States Federal Government, thus subject to federal regulation by

laws arising under the United States Constitution, specifically Title 34 Code of Federal Regulations.

19.

Plaintiff alleges that Defendants discriminated against Plaintiff by subjecting Plaintiff to admission requirements not applicable to other applicants. Specifically, Plaintiff whom has completed an entire year of an accredited Masters of Social Work program was required to complete 6 hours of preparatory course work prior to admission, when other applicants equal or less qualifications are not required to do so, nor does the Catalog for the Baylor University School of Social Work recommend such requirements (Exhibit #3)

20.

Plaintiff alleges that during summer term 2013 he was subjected to racial discrimination at the hands of Dr. Helen Harris in an academic setting.

21.

Plaintiff alleges that Dr. Helen Harris unfair grading, unfair treatment, and overall attitude toward Plaintiff was primarily racially motivated thus resulting in discrimination based on race.

22.

Plaintiff asked Dr. Helen Harris if she would change his grade if she found errors in which she did not give Plaintiff proper credit. Dr. Helen Harris stated she would not give Plaintiff credit if discovered she made grading errors because to give Plaintiff credit meant she would have to give everyone else credit. As a result of Dr. Helen Harris conduct, Plaintiff suffered severe emotional distress not limited to but including: loss of

sleep, loss of appetite, inability to concentrate during and after classes, loss of desire for sexual intercourse, feelings of depression, and loss of social enjoyment.

23.

Plaintiff alleges that Dr. Helen Harris disclosure of her mother's membership in Adolph Hitler's Nazi party, and stated that her mother was a good person, caused Plaintiff severe emotional distress as stated in paragraph 22.

24.

Dr. Helen Harris told Plaintiff and other students that she (Dr. Helen Harris) was the gatekeeper of the social work profession whom duties were to ensure that every student not fit for social work practice does not graduate from the School of Social Work program. This caused Plaintiff severe emotional distress as stated in paragraph 22.

25.

Dr. Helen Harris use of the word "Nigger" when referring to patients, involved no academic purpose, and subject plaintiff to severe emotional distress.

26.

In what Plaintiff describes as the "Mother of all Commenting", Defendant Dr. Helen Harris commented 80 times on a single assignment in which Plaintiff earned a grade of 73%. Such commenting was unfair, bias, atrocious, and caused Plaintiff severe emotional distress as stated in paragraph 22.

27.

Dr. Robin K. Rogers failure to correct Plaintiff enrollment status to unconditional, thus forcing Plaintiff to complete a candidacy period when such period was not applicable to

Plaintiff caused Plaintiff severe and emotional distress and monetary damages (Exhibit #3).

28.

Defendant Robin K. Rogers changed Plaintiff enrollment status from “Enrolled Student”, to “Candidate for Admission”, which effectively took plaintiff out of the Master of Social Work Program, as a result Plaintiff suffered damages by not being allowed to enroll into the Master of Social Work Program.

29.

Plaintiff did not receive an official notice of being admitted into the Advance Standing Program informing potential students of “candidacy period” nor did plaintiff apply to the Advance Standing Program Option.

30.

Defendant Robin K. Rogers referred Plaintiff to the law office of Kara Pratt in Hillsboro, Texas to aid Kara Pratt in a child custody matter. Kara Pratt specifically requested a student with both a legal and social work background. While assisting Kara Pratt, Plaintiff was introduced to several distinguished persons including; Judges, Lawyers, Chief of Police, and a Child Protective Service Agent. Plaintiff was considering Hillsboro, Texas as a new home considering the invitations from the aforementioned person requesting that Plaintiff and Plaintiff wife due to their professional careers make Hillsboro, Texas their home and establish careers in Hillsboro, Texas. Since Plaintiff have been academically dismissed, Plaintiff could not continue assisting clients under the auspices of Baylor School of Social Work, therefore, Plaintiff has suffered injuries related to but not limited to; professional competence, intellectually competence, loss of



future employment, loss of opportunities, loss of professional relationship, and Plaintiff overall professionalism has been compromised.

31.

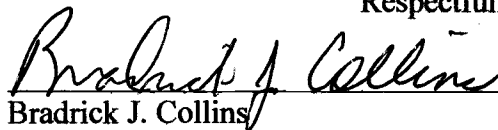
Defendant reported to the Texas Board of Law Examiners on April 22, 2014 in a letter signed by Associate Dean Bethany McCraw, stating that plaintiff has been disciplined for violating Baylor University Honor/Ethics code, when in fact, plaintiff has never been disciplined by Baylor University concerning any matter (Exhibit #4).

V.

**PRAYER FOR RELIEF**

**WHEREFORE, PREMISES CONSIDERED**, Plaintiff Bradrick J. Collins respectfully prays that Defendants Baylor University, Associate Dean Robin K. Rogers, Assistant Professor Helen Harris be cited to appear herein and, upon the trial hereof, that Plaintiff be awarded a judgment for \$100 million dollars, actual damages, attorney fees, exemplary damages, punitive damages, pre and post judgment interest against Defendants as allowed by law, all cost of the court, as well as any and all other relief, both general and special, at law or in equity to which Plaintiff may show himself to be justly entitled.

Respectfully submitted,



Bradrick J. Collins  
P.O. Box 225071  
Dallas, Texas 75225  
Phone: (469) 865 - 3290

# EXHIBIT 1

Exhibit 1: Admission Letter



# BAYLOR

UNIVERSITY

December 19, 2012

Bradrick Collins  
P.O. Box 54440  
Baton Rouge, LA 701892

Dear Mr. Collins:

The Admissions Committee of the Master in Social Work program reviewed your application and has recommended you for admission into the Standard Master of Social Work program of the School of Social Work for the fall 2013 semester *pending receipt of your final transcript showing degree completion before the start of the MSW classes.*

The offer of admission reflects the Committee's confidence in you as a student who is well suited to the opportunities at Baylor. Your application, undergraduate coursework, and letters of recommendation indicate that you are a person who values learning and difference-making in the lives of persons, families, and communities. For all of these reasons, we look forward to your enrollment in our MSW program.

As you consider this offer for admission into the Baylor MSW program, I wanted you to be aware that many positions in social work require that you receive certification or licensure as a professional social worker. In fact, social work is a protected title in a number of states and licensure is required in order to call oneself a social worker. In addition to having an MSW from an accredited program, many states including Texas require that you pass an examination in order to earn a certificate or a license. I also wanted you to be aware that you may be required to submit to a criminal background check or substance use screens in order to secure some internships as well as in future employment settings.

A letter concerning your financial aid from the School of Social Work is enclosed. Do check with the financial aid office (254-710-2611 or email: [Financial\\_Aid@baylor.edu](mailto:Financial_Aid@baylor.edu)) for information about other sources of financial aid.

We have enclosed a form for you to indicate your intent to enroll. We will need this form and a deposit of \$300 in order to reserve your placement in the class of 2013-14. The deposit will be applied toward your tuition. Please return it to the Admissions Coordinator within three weeks time of receiving this letter. You may choose to either mail this letter with a check for \$300 enclosed to the address provided below, or you may go to [www.baylor.edu/social\\_work/deposit](http://www.baylor.edu/social_work/deposit) to fill out this form electronically and pay by credit card. **Your Baylor ID number is 891-88-0860.**

**EXHIBIT                    2**

## **Baylor University Master of Social Work Statement of Intent**

**Instructions:** You must return this statement of intent within three weeks of receiving your official letter of acceptance. A deposit of \$300 is due with your returned statement of intent. This deposit will be applied toward your tuition cost. You may choose to either mail this letter with a check for \$300 enclosed to the address provided below, or you may go to [www.baylor.edu/social\\_work/deposit](http://www.baylor.edu/social_work/deposit) to fill out this form electronically and pay by credit card.

In order to prepare for the incoming class, we need to know your intention of attending the Master of Social Work program at Baylor University. Please write your name on the line indicating your intention.

### **I PLAN TO ATTEND THE BAYLOR UNIVERSITY:**

Bradrick Collins

Print or type your name

1/2/2013

Date

*Please indicate which program you plan to attend:*

- ☒ Standard MSW two year program in the fall of \_\_\_\_.
- \_\_\_\_ Advanced Standing MSW one year program in the summer of \_\_\_\_.
- \_\_\_\_ Advanced Standing MSW on year program in the fall of \_\_\_\_.
- \_\_\_\_ MSW/M.Div four year program. I plan to start the MSW portion of the program in the fall of \_\_\_\_.
- \_\_\_\_ I have been accepted into Truett's MDV program
- \_\_\_\_ I have not yet been accepted into Truett's MDV program
- \_\_\_\_ Advanced Standing/M.Div three year program. I plan to start the MSW portion of the program in the summer of \_\_\_\_.
- \_\_\_\_ I have been accepted into Truett's MDV program
- \_\_\_\_ I have not yet been accepted into Truett's MDV program
- \_\_\_\_ Advanced Standing/M.Div three year program. I plan to start the MSW portion of the program in the fall of \_\_\_\_.
- \_\_\_\_ I have been accepted into Truett's MDV program
- \_\_\_\_ I have not yet been accepted into Truett's MDV program
- \_\_\_\_ MSW/MTS four year program. I plan to start the MSW portion of the program in the fall of \_\_\_\_.
- \_\_\_\_ I have been accepted into Truett's MTS program
- \_\_\_\_ I have not yet been accepted into Truett's MTS program
- \_\_\_\_ Advanced Standing/MTS three year program. I plan to start the MSW portion of the program in the summer of \_\_\_\_.
- \_\_\_\_ I have been accepted into Truett's MTS program
- \_\_\_\_ I have not yet been accepted into Truett's MTS program
- \_\_\_\_ Advanced Standing/MTS three year program. I plan to start the MSW portion of the program in the fall of \_\_\_\_.
- \_\_\_\_ I have been accepted into Truett's MTS program
- \_\_\_\_ I have not yet been accepted into Truett's MTS program
- \_\_\_\_ MSW/MBA three year program. I plan to start the MSW portion of the program in the fall of \_\_\_\_.
- \_\_\_\_ I have been accepted into Hankamer's MBA program
- \_\_\_\_ I have not yet been accepted into Hankamer's MBA program
- \_\_\_\_ Advanced Standing/MBA two year program. I plan to start the MSW portion of the program in the summer of \_\_\_\_.
- \_\_\_\_ I have been accepted into Hankamer's MBA program
- \_\_\_\_ I have not yet been accepted into Hankamer's MBA program
- \_\_\_\_ Advanced Standing/MBA two year program. I plan to start the MSW portion of the program in the fall of \_\_\_\_.
- \_\_\_\_ I have been accepted into Hankamer's MBA program
- \_\_\_\_ I have not yet been accepted into Hankamer's MBA program

It would be helpful to have comments regarding your timing of entering our program: \_\_\_\_\_

### **I plan to attend the program:**

☒ Full time ☐ Part-time

### **I DO NOT PLAN TO ATTEND THE BAYLOR UNIVERSITY MSW PROGRAM.**

Print or type your name

Date

*Please indicate your reason for not attending below:*

- ☐ Not attending graduate school at this time
- ☐ Attending another MSW program
- ☐ Insufficient financial assistance from Baylor School of Social Work
- If additional financial aid was available to me, I would attend. ☐ Yes ☐ No
- ☐ Other: \_\_\_\_\_

Please provide comments regarding your decision to decline our offer of admission: \_\_\_\_\_

If you would like to defer your admission for one year, please email your request to [MSW\\_Admissions@baylor.edu](mailto:MSW_Admissions@baylor.edu).

***\*Please return this form within three weeks time to the Admissions Coordinator.\****

MSW Admissions Coordinator  
School of Social Work  
One Bear Place #07220

Phone: (254)710-7853  
Fax: (254) 710-6455  
Email: [MSW\\_Admissions@baylor.edu](mailto:MSW_Admissions@baylor.edu)

**EXHIBIT                    3**

# BAYLOR

UNIVERSITY

August 21, 2013

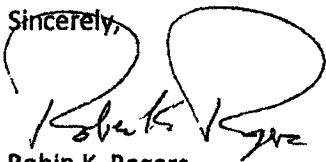
Mr. Bradrick Collins  
4825 Thames Drive  
Grand Prairie, TX 75052-8399

Dear Mr. Collins,

On August 15, 2013, the MSW Admissions Committee voted not to admit you to the MSW Advanced Standing program due to your grades of B- and F in the two summer Advanced Standing courses. Although the decisions of the MSW Admissions Committee are final (School of Social Work Catalog, p. 49, <http://www.baylor.edu/content/services/document.php/177077.pdf>), I agreed to receive your request for a reversal of that decision. Having carefully considered your letter and accompanying documents, I have not identified grounds for requesting that the committee reverse its decision.

I appreciate the sacrifice you and your wife have made for you to continue your education at Baylor and your fervent desire to be of service to serve others in Waco and beyond. It is my heartfelt wish that you find an alternate yet meaningful pathway to fulfilling your calling to service.

Sincerely,



Robin K. Rogers  
Associate Dean for Graduate Studies



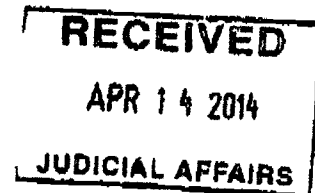
**EXHIBIT            4**



**Board of Law Examiners**  
 Appointed by the Supreme Court of Texas  
 P.O. Box 13488 \* Austin, Texas 78711-3488  
 College Form



April 09, 2014



BAYLOR UNIVERSITY  
 BETHANY MCCRAW, OFFICE OF JUDICIAL AFFAIRS  
 P O BOX 97073  
 WACO TX 76798-7073

RE: Bradrick Gerimaine Collins  
 SSN: xxx-xx-8350 DOB: 06/11/74  
 DATE(S): MSW 07/14 to 08/14

**PLEASE FAX YOUR RESPONSE TO (512)475-0637. DO NOT  
 INCLUDE COVER SHEET OR COPY OF AUTHORIZATION.**

The individual named above has begun the application process for admission to the Bar of Texas and has stated that (s)he attended your institution during the dates shown above. One requirement for admission to the Texas Bar is a finding of good moral character and fitness. Please assist us in our character and fitness investigation of this individual by responding to the following inquiries.

- |  | YES | NO |
|--|-----|----|
| 1. Are you aware of any incident in which the individual named above violated any law or statute?  | —   | ✓  |
| 2. Has (s)he been disciplined by your institution for violating any disciplinary/honor/ethics code? If so, please provide details, legible copies of all relevant documents, and a copy of the violated disciplinary/honor/ethics code for each incident.  | ✓   | —  |
| 3. Are you aware of any incident or circumstance wherein (s)he exhibited dishonesty or breached a duty of trust?   | ✓   | —  |
| 4. Do you have any reason to believe that (s)he has been involved in the use of illegal substances or the abuse or excessive use of alcohol?   | —   | ✓  |
| 5. Using a separate sheet of paper, please explain any "YES" responses and comment on anything in this individual's background that would cause you to question his/her honesty or trustworthiness or to believe that this individual would be likely to harm a client if licensed to practice law in Texas. |     |    |

**Information provided by:**

Printed Name: Bethany J McCraw Signature: Bethany J McCraw  
 Associate Dean for Student Conduct Administration  
 Baylor University  
 One Bear Place #97073  
 Waco, TX 76798-7073  
 Title: 254-710-1715 Telephone:                      Date: 4/22/14

**Please mail response ONLY if it is not sent by fax.**

Direct questions to: Julie Brown, Licensure Analyst, 512-463-5697

W15CA112

JS 44 (Rev. 12/12)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM)

## I. (a) PLAINTIFFS

Bradrick J. Collins

(b) County of Residence of First Listed Plaintiff

Dallas

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

## DEFENDANTS

Baylor University, Robin K. Rogers + Helen Harris

County of Residence of First Listed Defendant

McLennan

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

☐ 1 U.S. Government Plaintiff☒ 3 Federal Question  
(U.S. Government Not a Party)☐ 2 U.S. Government Defendant☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input checked="" type="checkbox"/> 160 Stockholders' Suits <input checked="" type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input checked="" type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PRISONER PETITIONS</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

☒ 1 Original Proceeding    ☐ 2 Removed from State Court    ☐ 3 Remanded from Appellate Court    ☐ 4 Reinstated or Reopened    ☐ 5 Transferred from Another District (specify)    ☐ 6 Multidistrict Litigation

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Civil Rights Act Title 7: 42 USC 1981, 28 USC 1343

Brief description of cause:

Discrimination and Breach of Contract

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

SIGNATURE OF ATTORNEY OF RECORD

Bradrick J. Collins (Pro Se)

4-10-15  
FBI OFFICE FOR ARIZONA

INTAKE COPY

# FILING FEE RECEIPT COPY

DUPLICATE

Court Name: TEXAS WESTERN  
Division: 6  
Receipt Number: 600016415  
Cashier ID: mcopp  
Transaction Date: 04/10/2015  
Payer Name: BRADRICK J COLLINS

CIVIL FILING FEE  
For: BRADRICK J COLLINS  
Amount: \$400.00

PAPER CHECK  
Check/Money Order Num: 21990347728  
Amt Tendered: \$400.00

Total Due: \$400.00  
Total Tendered: \$400.00  
Change Amt: \$0.00

CIVIL FILING FEE FOR  
D-TXW-6-15-CV-112; MONEY ORDER PAID  
BY BRADRICK COLLINS